

EXHIBIT 2



U.S. Department of Justice

Federal Bureau of Investigation

Boston Field Office
201 Maple Street
Chelsea, MA 02150
857-386-2000

I, Robert Plumb, do hereby declare and state as follows:

1. I am a Supervisory Special Agent with the Federal Bureau of Investigation, a position I assumed in December 2024. Prior to becoming a Supervisory Special Agent, I was a Special Agent on an FBI Counterintelligence squad for approximately eight years, and I previously served as an FBI Intelligence Analyst for approximately six years. As a Special Agent and now as a Supervisory Special Agent, I have received training at the FBI Academy located in Quantico, Virginia, including training on investigative methods and training specific to counterintelligence, espionage, and cyber investigations. I am currently assigned to a cyber national security squad at the FBI Boston Field Office.

2. I have reviewed the pleadings in the case against Mahdi Mohammad Sadeghi, a/k/a Mohammad Mahdi Sadeghi (“Sadeghi”) who has been charged with violating the International Emergency Economic Powers Act (“IEEPA”) and the Iranian Transactions and Sanctions Regulations, which are codified at 50 U.S.C. §§ 1701-1710 and 31 C.F.R. part 560, respectively.

3. I have also reviewed the records pertinent to this declaration and have discussed the evidence pertinent to this declaration with other FBI agents in the Boston Field Office.¹

¹ I have also participated in a witness interview, which is not the subject of this declaration.

Based on my experience and training, I am familiar with investigative techniques and evidence collection, including those used in the instant case.

4. I make the following statements based upon my personal knowledge and information made available to me in my official capacity.

5. I have reviewed a video of the FBI's voluntary, *Mirandized* interview of Sadeghi on December 16, 2024, the day of Sadeghi's arrest. During the course of that interview, Sadeghi told the FBI that he visited SDRA a few times while in Iran. He also stated that he goes to SDRA maybe once a year and that every time he visited Abedini, it was usually at Abedini's office.

6. I have also reviewed the following evidence:

- a. *A text message dated January 7, 2023, which Sadeghi sent to a phone number that is associated with the individual referred to as "U.S. Company 1 Employee" in the Complaint Affidavit.* The text message contained a hyperlink to a January 4, 2023 CNN article titled, "A single Iranian attack drone found to contain parts from more than a dozen US companies." The article discusses the fact that electronic components made by U.S. Company 1 had been identified in an Iranian Shahed drone downed in Ukraine in 2022.
- b. *WhatsApp messages² from a WhatsApp group on Sadeghi's phone and a business card, as described below.* On or about August 2, 2022, an individual with the same name as the individual referred to as "Person 2" in the Complaint Affidavit started a WhatsApp group titled, "Iran lunch." A third individual was

² All of the WhatsApp messages described herein were translated using machine translation. I have reviewed the pertinent translations.

subsequently added to the “Iran lunch” WhatsApp group. A business card found during the search of Sadeghi’s residence identified that third individual as the “Coordinator, International Affairs” for the Iranian National Elites Foundation (“INEF”) (“Iranian Official 1”). An online profile of Iranian Official 1 also reflected the above-described title and INEF affiliation for Iranian Official 1. According to the messages, Sadeghi, Iranian Official 1, and the third person in the “Iran lunch” WhatsApp group planned to meet for lunch on August 3, 2022 at a particular kebab restaurant in Tehran, Iran, for which Sadeghi provided a URL that resolved to an address in Tehran.

- c. *A photograph located on Sadeghi’s phone that depicts Sadeghi at an outdoor restaurant table with two other individuals and corresponding WhatsApp messages, as described below.* On August 3, 2022, Iranian Official 1 sent the “Iran lunch” WhatsApp group a message regarding their meeting earlier that day and requested a photograph from the meeting. Official 1 subsequently received a photograph in the “Iran lunch” WhatsApp group on August 4, 2022, which depicted three people at an outdoor restaurant.
- d. *WhatsApp messages dated August 31, 2022 between Sadeghi and Iranian Official 1.* On August 31, 2022, Iranian Official 1 sent Sadeghi a link to a website titled, “Strategic Center for Converging Technologies (NBIC).” Based on open-source research, NBIC is also known as the “Iran Converging Technologies Strategic Center (NBIC),” an organization that, according to open-source research, falls under the Iranian Vice Presidency for Scientific and Technology Affairs and seeks to “meet the needs of human beings through integration and synergy” of

multiple kinds of technology. Iranian Official 1 indicated that the director of the center needed advice and guidance regarding robotics and sensors and asked Sadeghi whether he could help. On the same day, Sadeghi responded that it would be no problem and requested contact information. Based on Sadeghi's travel records, as described below, Sadeghi was still in Iran on August 31, 2022.

- e. *A photograph that depicts Sadeghi, co-defendant Mohammad Abedini, and a third individual.* The creation date of the photograph indicates that the photograph was taken on or about August 15, 2024. Metadata associated with the photograph indicates that the photograph was taken in Tehran, Iran.
 - i. *A post and photograph from the website known as “X” that includes the first and last name of the individual who is identified as the “CTO at SDRA.”* The photograph appears to be the third individual in the August 15, 2024 photograph with Sadeghi and Abedini.

7. I have also reviewed a summary prepared by FBI employees familiar with the evidence in the case, which reflects Sadeghi's known international travel. That summary indicates that Sadeghi traveled to and stayed in Iran on or about the following dates:

- a. Jan. 2, 2016 – Feb. 13, 2016
- b. July 27, 2016 – Aug. 11, 2016
- c. Jan. 12, 2017 – Feb. 10, 2017
- d. May 16, 2018 – June 23, 2018
- e. Feb. 1 – Feb. 25, 2019
- f. Dec. 16, 2019 – Jan. 11, 2020
- g. July 3 – July 24, 2021

h. July 27, 2022 – Sept. 10, 2022

i. June 14, 2023 – July 19, 2023³

j. July 17, 2024 - Aug 23, 2024

* * *

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Robert Plumb
Robert Plumb
Supervisory Special Agent, Federal Bureau of Investigation

³ Travel records reflect that Sadeghi also traveled to South Korea during this time.